

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

FOUR WOMEN HEALTH SERVICES,  
LLC.

Plaintiff,

v.

ABUNDANT HOPE PREGNANCY  
RESOURCE CENTER INC. D/B/A  
ATTLEBORO WOMEN'S HEALTH  
CENTER, CATHERINE ROMAN, NICOLE  
CARGES, DARLENE HOWARD, AND  
CHOOSE LIFE MARKETING, LLC,

Defendants.

Case No. 1:24-cv-12283-JEK

**DEFENDANT CHOOSE LIFE MARKETING, LLC'S UNOPPOSED MOTION FOR  
LEAVE TO EXCEED PAGE LIMIT**

Defendant Choose Life Marketing respectfully moves that it be allowed to file the attached memorandum in support of its Motion to Dismiss *instanter*, which exceeds the Local Rule 7.1(b)(4) page limit by 8 pages, for a total of 28 pages of argument. Due to the importance of the constitutional issues at stake in this matter, the complexity of the precedent interpreting the Lanham Act and Mass. Gen. Laws Ch. 93(A), both in federal and state courts, Choose Life requires additional pages to fully brief the issues relevant to their motion. Choose Life's counsel conferred with Plaintiff's counsel, and they indicated that Plaintiff assents to a motion for an additional 15 pages. Therefore, Choose Life respectfully requests leave to file the attached memorandum of law in support of its Motion to Dismiss, of 28 pages of argument.

Respectfully submitted, this 14th day of March, 2025.

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**CERTIFICATION UNDER LOCAL RULE 7.1(a)(2)**

Pursuant to Local Rule 7.1(a)(2), on March 14, 2025, counsel for Choose Life Marketing conferred with Plaintiff's counsel in a good faith attempt to resolve or narrow the issues raised by this motion. Plaintiff's counsel indicated that Plaintiff does not oppose this motion.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2025, a true copy of the foregoing will be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

Dated: March 14, 2025

/s/ Ryan P. McLane

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